

FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Nancy Fletcher, Treasurer  
Outdoor Advertising Association of America  
Political Action Committee  
1850 M Street, NW, Suite 1040  
Washington, DC 20036

OCT 09 2002

Identification Number: C00045781

Reference: Amended July Quarterly Report (4/1/02-6/30/02), received 8/14/02

Dear Ms. Fletcher:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule B of your report (pertinent portion(s) attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) prohibits a multicandidate committee and its affiliates from making a contribution to a candidate for federal office in excess of \$5,000 per election.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If any contribution you made exceeds the limits, you must request a refund of the excessive amount or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund of the excessive amount.

## OUTDOOR ADVERTISING ASSOCIATION OF AMERICA POLITICAL ACTION

COMMITTEE

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Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

-Schedule B of your report discloses an in-kind contribution(s) designated for the general election, but made before the primary election (pertinent portion(s) attached). In-kind contributions of equipment, such as computers, with a long-term useful life (e.g., an election cycle, or perhaps longer) are similar to contributions of money and may be designated for elections beyond the next election, provided the contributor designates the contribution as such in writing. A contribution of this type of equipment is distinguishable from in-kind contributions that are used only for one particular election, such as non-exempt contributions of food or beverages consumed by primary election day workers, or printing or mailing costs related to general election events or fundraisers. Please amend your report to include a description of the nature of the in-kind contribution(s) in question. If the in-kind contribution(s) on your report does not have a "long-term useful life", it may constitute an excessive contribution(s) for the primary election (see Advisory Opinion 1996-29).

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If you have made an excessive contribution, you must request a refund or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent

OUTDOOR ADVERTISING ASSOCIATION OF AMERICA POLITICAL ACTION  
COMMITTEE  
PAGE 3

to the recipient committee(s). In addition, any refunds should be reported on Schedule A supporting Line 16 of the Detailed Summary Page of the report covering the period in which they are made. Redesignations should be reported as memo entries on Schedule B of the report covering the period in which the redesignation is made. 11 CFR §110.2(b)

Although the Commission may take further legal steps, prompt action by your committee to refund or seek redesignation of the excessive amount will be considered.

-Schedule B supporting Line 23 of your report discloses one or more contributions to a candidate(s) for the 2002 West Virginia, New Jersey, and Ohio Primary elections; however, the funds were disbursed after the election date(s) (pertinent portion(s) attached). Please note that contributions may not be designated for an election which has already occurred unless the funds are to be used to reduce a candidate committee's debts incurred during that election campaign.

If any apparently impermissible contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If you have made an impermissible contribution, you must request a refund or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

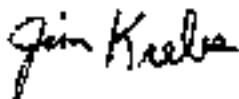
Although the Commission may take further legal action regarding this impermissible activity, your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

OUTDOOR ADVERTISING ASSOCIATION OF AMERICA POLITICAL ACTION  
COMMITTEE  
PAGE 4

-Line 23 of the Detailed Summary Page of your report discloses, as memo entries, apparent in-kind contributions to Lobiondo For Congress, Duncan For Congress, Friends of Max Cleland, Pat Roberts For Senate, Mica For Congress, and Rehberg For Congress. Please note that the dollar amount of a memo entry is not included in the total figure for the schedule. Please amend your report to provide further clarifying information regarding these transactions.

A response or amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Jim Krebs  
Campaign Finance Analyst  
Reports Analysis Division

**SCHEDULE B (FEC Form 3X)**  
**ITEMIZED DISBURSEMENTS**

 Use separate schedule(s)  
 for each category of the  
 Detailed Summary Page

 FOR LINE NUMBER:  
 (check only one)

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<input type="checkbox"/> 21b	<input type="checkbox"/> 22	<input checked="" type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25
<input type="checkbox"/> 26	<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c
				<input type="checkbox"/> 29

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions  
 or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

**NAME OF COMMITTEE (in Full)**

Outdoor Advertising Association of America Political Action Committee

Full Name (Last, First, Middle Initial)

A. Grand Hyatt Washington

Mailing Address

Dept. 350

City Washington State DC Zip Code 20042

Purpose of Disbursement

In Kind contribution for Cong. Duncan

Candidate Name

DUNCAN FOR CONGRESS

Date of Disbursement

05 / 29 / 2002

Amount of Each Disbursement this Period

302.51

**[MEMO ITEM]**

Transaction ID: SB23.5470

Date of Disbursement

05 / 29 / 2002

Amount of Each Disbursement this Period

262.39

Full Name (Last, First, Middle Initial)

B. Grand Hyatt Washington

Mailing Address

Dept. 350

City Washington State DC Zip Code 20042

Purpose of Disbursement

In Kind contribution to Sen. Reid

Candidate Name

 Category/  
Type

Transaction ID: SB23.5472

Date of Disbursement

05 / 31 / 2002

Amount of Each Disbursement this Period

1000.00

Full Name (Last, First, Middle Initial)

C. GRAVES FOR CONGRESS

Mailing Address

4701 NW 82nd Street

City Kansas City State MO Zip Code 64151

Purpose of Disbursement

Candidate Name

 Category/  
Type

Transaction ID: SB23.5481

1262.38

SUBTOTAL of Disbursements this Page (optional) ►

TOTAL This Period (last page this line number only) ►

**SCHEDULE B (FEC Form 3X)**  
**ITEMIZED DISBURSEMENTS**

 Use separate schedule(s)  
 for each category of the  
 Detailed Summary Page

 FOR LINE NUMBER:  
 (check only one)

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<input type="checkbox"/> 21b	<input type="checkbox"/> 22	<input checked="" type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25
<input type="checkbox"/> 26	<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c
				<input type="checkbox"/> 29

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NAME OF COMMITTEE (in Full)  
 Outdoor Advertising Association of America Political Action Committee

Full Name (Last, First, Middle Initial)

**A. CITIZENS FOR ARLEN SPECTER**

 Mailing Address  
**734 7TH STREET, SE, 2ND FLOOR 111 SOUTH 15TH STREET**

 City **WASHINGTON** State **DC** Zip Code **20003**

Purpose of Disbursement

Date of Disbursement

**M M / D D / Y Y Y Y  
05 28 2002**

Amount of Each Disbursement this Period

**500.00**

Candidate Name

 Category/  
Type

 Office Sought: House  
 Senate  
 President
 Disbursement For: 2004  
 Primary       General  
 Other (specify) 

 Transaction ID: **SB23.5475**

Full Name (Last, First, Middle Initial)

**B. CRAIG FOR U S SENATE**

 Mailing Address  
**PO BOX 2754 802 W BANNOCK SUITE LP101**

 City **BONNE** State **ID** Zip Code **83701**

Date of Disbursement

**M M / D D / Y Y Y Y  
06 11 2002**

Amount of Each Disbursement this Period

**2500.00**

Purpose of Disbursement

Candidate Name

 Category/  
Type

 Office Sought: House  
 Senate  
 President
 Disbursement For: 2004  
 Primary       General  
 Other (specify) 

 Transaction ID: **SB23.5485**

Full Name (Last, First, Middle Initial)

**C. FRIENDS FOR HARRY REID**

 Mailing Address  
**PO BOX 33006**

 City **RENO** State **NV** Zip Code **89533**

Purpose of Disbursement

Candidate Name

 Category/  
Type

 Office Sought: House  
 Senate  
 President
 Disbursement For: 2004  
 Primary       General  
 Other (specify) 

 Transaction ID: **SB23.5454**

Amount of Each Disbursement this Period

**1500.00**

SUBTOTAL of Disbursements This Page (optional)

**4500.00**

TOTAL This Period (last page this line number only)

**SCHEDULE B (FEC Form 3X)**  
**ITEMIZED DISBURSEMENTS**

 Use separate schedule(s)  
 for each category of the  
 Detailed Summary Page

 FOR LINE NUMBER:  
 (check only one)

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<input type="checkbox"/> 21a	<input type="checkbox"/> 22	<input checked="" type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25
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28d 28e 28f 28g 28h 28i 28j 28k 28l 28m 28n 28o 28p 28q 28r 28s 28t 28u 28v 28w 28x 28y 28z

 Any information copied from such Receipts and Statements may not be sold or used by any person for the purpose of soliciting contributions  
 or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

**NAME OF COMMITTEE (In Full)**

Outdoor Advertising Association of America Political Action Committee

Full Name (Last, First, Middle Initial)

**A. FRIENDS FOR HARRY REID**

 Mailing Address  
 PO BOX 33006

 City NV Zip Code  
 RENO 89533

Purpose of Disbursement

Candidate Name

Date of Disbursement

 MM DD YY  
 11 07 2001

Amount of Each Disbursement this Period

5000.00

 Office Sought House  
 Senate  
 President

Disbursement For 2004

 Primary  General

Other (specify) □

State: NV District: 00

Full Name (Last, First, Middle Initial)

**B. FRIENDS OF JIM INHOFE COMMITTEE**

 Mailing Address  
 PO BOX 13300

 City OK Zip Code  
 OKLAHOMA CITY 73113

Purpose of Disbursement

Candidate Name

 Category/  
Type

 Office Sought House  
 Senate  
 President

Disbursement For 2002

 Primary  General

Other (specify) □

State: OK District: 00

Full Name (Last, First, Middle Initial)

**C. Friends of Jim Oberstar Comm.**

 Mailing Address  
 PO Box 465

 City MN Zip Code  
 Duluth 55802

Purpose of Disbursement

Candidate Name

 Category/  
Type

 Office Sought x House  
 Senate  
 President

Disbursement For 2002

 Primary  General

Other (specify) □

State: MN District: 8

Transaction ID: SB23.5134

Date of Disbursement

 MM DD YY  
 08 06 2001

Amount of Each Disbursement this Period

2000.00

Transaction ID: SB23.5173

Date of Disbursement

 MM DD YY  
 08 06 2001

Amount of Each Disbursement this Period

2000.00

8000.00

SUBTOTAL of Disbursements This Page (optional) ►

TOTAL This Period (last page this line number only) ►

**SCHEDULE B (FEC Form 3X)**  
**ITEMIZED DISBURSEMENTS**

 Use separate schedule(s)  
 for each category of the  
 Detailed Summary Page

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 (check only one)

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**NAME OF COMMITTEE (in Full)**  
 Outdoor Advertising Association of America Political Action Committee

Full Name (Last, First, Middle Initial)

**A.** Friends of Jim Oberstar Comm.

Mailing Address

PO Box 465

City

Duluth

State

MN Zip Code

Purpose of Disbursement

Candidate Name

Date of Disbursement

04 \* / 16 \* / 2002 \*

Amount of Each Disbursement this Period

1000.00

 Office Sought:  House Disbursement For: 2002

Senate

X Primary

General

President

Other (specify) ▼

Transaction ID: SB23.5447

State: MN District: 2

Full Name (Last, First, Middle Initial)

**B.** FRIENDS OF MAX CLELAND

Mailing Address

1100 SPRING STREET SUITE 600A P O BOX 7843

City

ATLANTA

State

GA Zip Code

30309

Amount of Each Disbursement this Period

500.00

Purpose of Disbursement

Candidate Name

 Category/  
Type

Office Sought: House

Disbursement For: 2002

 Senate

General

President

Other (specify) ▼

Transaction ID: SB23.5483

State: GA District: 00

Full Name (Last, First, Middle Initial)

**C.** FRIENDS OF MIKE FERGUSON

Mailing Address

980 Stayvessant Avenue #17

City

Union

State

NJ Zip Code

Date of Disbursement

06 \* / 24 \* / 2002 \*

Amount of Each Disbursement this Period

1000.00

Purpose of Disbursement

Candidate Name

 Category/  
Type

 Office Sought:  House Disbursement For: 2002

X Primary

General

Senate

Other (specify) ▼

Transaction ID: SB23.5493

State: NJ District: 07

2500.00

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

**SCHEDULE B (FEC Form 3X)**  
**ITEMIZED DISBURSEMENTS**

 Use separate schedule(s)  
 for each category of the  
 Disbursed Summary Page

 FOR LINE NUMBER:  
 (check only one)

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 21b     22     23     24     25  
 26     27     28a     28b     28c     29

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**NAME OF COMMITTEE (In Full)**

Outdoor Advertising Association of America Political Action Committee

Full Name (Last, First, Middle Initial)

**A. BOB NEY FOR CONGRESS**

Mailing Address

PO BOX 490

City

ST CLAIRSVILLE

State

OH

Zip Code

43960

Purpose of Disbursement

Candidate Name

 Category/  
Type

Office Sought:

 House  
 Senate  
 President

Disbursement For:

2002

 Primary

General

 Other (specify) 

State: OH

District: 18

Full Name (Last, First, Middle Initial)

**B. BRIAN BAIRD FOR CONGRESS**

Mailing Address

1516 FRANKLIN ST

City

VANCOUVER

State

WA

Zip Code

98660

Purpose of Disbursement

Candidate Name

 Category/  
Type

Office Sought:

 House  
 Senate  
 President

Disbursement For:

2002

 Primary

General

 Other (specify) 

State: WA

District: 03

Full Name (Last, First, Middle Initial)

**C. Cetering by Windows**

Mailing Address

1125 North Royal St.

City

ALEXANDRIA

State

VA

Zip Code

22314

Purpose of Disbursement

In kind contribution Cong. LoBiondo

Candidate Name

LOBIONDO FOR CONGRESS

 Category/  
Type

Office Sought:

 House  
 Senate  
 President

Disbursement For:

2002

 Primary

General

 Other (specify) 

State: NJ

District: 03

SUBTOTAL of Disbursements This Page (optional)

1500.00

TOTAL This Period (last page this box number only)

**SCHEDULE B (FEC Form 3X)**  
**ITEMIZED DISBURSEMENTS**

 Use separate schedule(s)  
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 Detailed Summary Page

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 (check only one)

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<input type="checkbox"/> 26	<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c
				29

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## NAME OF COMMITTEE (In Full)

Outdoor Advertising Association of America Political Action Committee

Full Name (Last, First, Middle Initial)

**A. PAT ROBERTS FOR SENATE**

 Mailing Address  
 BOX 15

City DODGE CITY State KS Zip Code 67801

Purpose of Disbursement

Candidate Name

 Category/  
 Type

 Office Sought:  House  
 Senate  
 President  
 State: KS District: 00

 Disbursement For: 2002  
 Primary  
 General  
 Other (specify) ▼

Date of Disbursement

6/16/02 P.M. 2002

Amount of Each Disbursement this Period

2500.00

Transaction ID: SB23.5444

Full Name (Last, First, Middle Initial)

**B. REHBERG FOR CONGRESS**

 Mailing Address  
 P.O. Box 1597

City Helena State MT Zip Code 59624

Purpose of Disbursement

Candidate Name

 Category/  
 Type

 Office Sought:  House  
 Senate  
 President  
 State: MT District: 00

 Disbursement For: 2002  
 Primary  
 General  
 Other (specify) ▼

Date of Disbursement

6/5/02 P.M. 2002

Amount of Each Disbursement this Period

1000.00

Transaction ID: SB23.5452

Full Name (Last, First, Middle Initial)

**C. SHELLEY MOORE CAPITO FOR CONGRESS**

 Mailing Address  
 P.O. Box 11519

City Charleston State WV Zip Code 25339

Purpose of Disbursement

Candidate Name

 Category/  
 Type

 Office Sought:  House  
 Senate  
 President  
 State: WV District: 02

 Disbursement For: 2002  
 Primary  
 General  
 Other (specify) ▼

Date of Disbursement

6/5/02 P.M. 2002

Amount of Each Disbursement this Period

1000.00

WV Primary was 5/14/02.

Transaction ID: SB23.5461

SUBTOTAL of Disbursements This Page (optional) ►

4500.00

TOTAL This Period (last page this line number only) ►

22037753854